

**Comment 1 for Public Comments for LCFS pathway applications
(tier2lcfspathways-ws) - 1st Workshop.**

First Name: Timo

Last Name: Haatainen

Email Address: tkjhaatainen@gmail.com

Affiliation:

Subject: DGS debit calculation in Tier I and Tier II calculators

Comment:

It would seem appropriate that corn oil DGS debit for RD/BD is calculated according to the same terms in both Tier I and Tier II calculators.

I have included comments on the differences I have observed on the attached PDF.

Based on the above it seems that DGD's CI calculation for corn oil based RD is not inline with the Tier I calculators approach on DGS debit.

Attachment: www.arb.ca.gov/lists/com-attach/1-tier2lcfspathways-ws-VzNVNAd1BAgFYAh6.pdf

Original File Name: DGS credit reduction RD and BD.pdf

Date and Time Comment Was Submitted: 2017-03-20 13:57:25

No Duplicates.

Comment 2 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws) - 1st Workshop.

First Name: Timo

Last Name: Haatainen

Email Address: tkjhaatainen@gmail.com

Affiliation:

Subject: Rendering energy consumption & RD yield

Comment:

Tier II calculator seems to allocate rendering energy consumption on BioOil tab in cell DS247.

```
(DS247 in Tier II)  
=B41*IF($G$14=2;AF208;IF($G$14=3;O213;IF($G$14=4;O222;1)))
```

```
(DS247 in Tier I)  
=3944, when tallow RD is chosen on the Tier I Calculator tab
```

To use the same calculation method as in Tier I tool it would seem appropriate that the Tier I rendering energy consumption would be inserted in this cell instead of B41.

Furthermore to align the calculation methodology with the Tier I tool it seems that the RD yield should also be considered in cell D52 on the BioOil tab. B52 = lb RD/lb tallow (or 1/D40)

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2017-03-20 14:15:11

No Duplicates.

**Comment 3 for Public Comments for LCFS pathway applications
(tier2lcfspathways-ws) - 1st Workshop.**

First Name: Robert

Last Name: Smith

Email Address: robxsmith@mac.com

Affiliation: I use 100% HPRD in my Tractor and Truck

Subject: Use of Used cooking oil to make Biodiesel in California

Comment:

Renewable Diesel is a superior drop in biofuel replacement for Fossil Diesel that is far superior to BioDiesel. BioDiesel is not a drop-in fossil diesel replacement and is actually detrimental to efforts for replacement of fossil fuel with biofuel because of its many problems even at B20 levels.

Used cooking oil is a feedstock that is most easily made into either RD or BD, but should not be wasted in California making BioDiesel.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2017-05-12 15:01:41

No Duplicates.

**Comment 4 for Public Comments for LCFS pathway applications
(tier2lcfs-pathways-ws) - 2nd Workshop.**

First Name: Nicholas

Last Name: Littlejohn

Email Address: nicklittlejohn@gmail.com

Affiliation: Citizen

Subject: Organic consideration

Comment:

We may consider giving organic dairies more credit as the feed has fewer petroleum derived fertilizer and pesticide inputs.

Thank you,
Nicholas

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2017-06-08 16:52:08

No Duplicates.

**Comment 5 for Public Comments for LCFS pathway applications
(tier2lcfs pathways-ws) - 2nd Workshop.**

First Name: Steve

Last Name: Hartig

Email Address: Steve.hartig@icminc.com

Affiliation: ICM, Incorporated

Subject: Comments on Pathway T2N-1153 Corn Fiber to Ethanol

Comment:

Please see attached.

Attachment: www.arb.ca.gov/lists/com-attach/10-tier2lcfs pathways-ws-WjlQNwd0BTRVDAVm.pdf

Original File Name: CARB Comment.pdf

Date and Time Comment Was Submitted: 2017-09-12 15:52:06

No Duplicates.

**Comment 6 for Public Comments for LCFS pathway applications
(tier2lcfspathways-ws) - 2nd Workshop.**

First Name: Brian

Last Name: Thome

Email Address: scaswell@edeniq.com

Affiliation: Edeniq, Inc.

Subject: Comments on Little Sioux Pathway Completion

Comment:

See attached.

Attachment: www.arb.ca.gov/lists/com-attach/11-tier2lcfspathways-ws-BWBQMgRgVmsGaQJz.pdf

Original File Name: Edeniq Comment to CARB re LSCP Pathway FINAL.pdf

Date and Time Comment Was Submitted: 2017-09-12 15:57:23

No Duplicates.

**Comment 7 for Public Comments for LCFS pathway applications
(tier2lcfspathways-ws) - 2nd Workshop.**

First Name: Thomas

Last Name: Lawson

Email Address: thomas@cngvc.org

Affiliation:

Subject: CNGVC Comment Letter

Comment:

Attached is our comment letter.

Thank you.

Attachment: www.arb.ca.gov/lists/com-attach/12-tier2lcfspathways-ws-WzgGblQyBCFQNVcI.pdf

Original File Name: CNGVC Comment Letter on Tier 2 Pathway 11.21.17.pdf

Date and Time Comment Was Submitted: 2017-11-20 18:25:51

No Duplicates.

Comment 8 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws) - 2nd Workshop.

First Name: Kenneth

Last Name: Koers

Email Address: koers@lifecycleassociates.com

Affiliation: Life Cycle Associates

Subject: Transportation distances for UCO

Comment:

First, it is unclear from the application how the transport distances for UCO are treated. What is not clear is if the oil is purchased from aggregators, or if REG is collecting themselves.

If the aggregators are collecting the UCO, is the 50 mile default and heavy duty truck assumption accurate?

If the aggregators are simply collecting UCO and delivering to the facility and the pathway assumes a conservative extra 50 miles, this should be made clear.

If the transport distance is for collection only not purchased from aggregators, are what does their transportation network look like? Are they utilizing full 80,000 GVW trucks for collection, or smaller trucks to pick up loads? If purchased by aggregators, the oil collected by REG for processing would have been collected for waste processing in any case.

Compare this to the recent pathway for General, which claims to have records for transportation distances (given in miles given per gallon), and gives a transportation of 5 miles. They specifically call out obtaining the UCO directly from restaurants, rather than aggregators.

Secondly, the application assigns the US average electricity mix to UCO rendering, which is defined in the feedstock phase. However, rendering is accomplished in the same location as biodiesel production and rendering is the only activity that occurs in the feed phase. So, the region for feed and fuel should be the same.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2018-05-23 11:13:11

No Duplicates.

**Comment 9 for Public Comments for LCFS pathway applications
(tier2lcfs pathways-ws) - 2nd Workshop.**

First Name: Kevin

Last Name: Hamilton

Email Address: kevin.hamilton@centralcalasthma.org

Affiliation: Central California Asthma Collaborative

Subject: T2N-1247

Comment:

With regard to this application. Central California Asthma Collaborative recommends denial due to coal fired burner being used to create steam for this process. CA renewable standards do not support coal or other non-renewable sources as any part of producing a renewable energy credit supported product.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2018-06-07 14:21:15

No Duplicates.

**Comment 10 for Public Comments for LCFS pathway applications
(tier2lcfspathways-ws) - 2nd Workshop.**

First Name: Larry

Last Name: Thrall

Email Address: larry.thrall@vireoenergy.com

Affiliation: Vireo Energy

Subject: solar electricity must be higher than grid electricity used

Comment:

The proposed pathway states: The CI value listed in the above table is valid only as long as the electricity (kWh) generated by the photovoltaic system exceeds the grid electricity (kWh) used.

Is this actual production in real time or is this on a net metered basis? If so, is it daily, monthly, yearly?

I am hoping that it will be calculated on a yearly net metered basis which would promote more solar and EV charging across California.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2018-10-25 16:47:02

No Duplicates.

**Comment 11 for Public Comments for LCFS pathway applications
(tier2lcfspathways-ws) - 2nd Workshop.**

First Name: Noah

Last Name: Bucon

Email Address: noah.bucon@resource-solutions.org

Affiliation: Center for Resource Solutions

Subject: CRS Comments on LCFS Tier 2 Pathways for PV-EV Charging

Comment:

Please see attached comments

Attachment: www.arb.ca.gov/lists/com-attach/17-tier2lcfspathways-ws-VjVVIQByUFwBZAlm.pdf

Original File Name: CRS Comments_LCFS Tier 2 Pathways_11.8.2018.pdf

Date and Time Comment Was Submitted: 2018-11-08 15:59:45

No Duplicates.

**Comment 12 for Public Comments for LCFS pathway applications
(tier2lcfspathways-ws) - 2nd Workshop.**

First Name: Don

Last Name: Scott

Email Address: DScott@biodiesel.org

Affiliation: National Biodiesel Board

Subject: Comments on T2N-1246 UCO to Biodiesel pathwya

Comment:

See attached.

Attachment: www.arb.ca.gov/lists/com-attach/18-tier2lcfspathways-ws-AGNVPFQ4V2kDYFc5.docx

Original File Name: Comments on T2N-1246 UCO to Biodiesel.docx

Date and Time Comment Was Submitted: 2019-01-15 15:21:52

No Duplicates.

**Comment 13 for Public Comments for LCFS pathway applications
(tier2lcfspathways-ws) - 2nd Workshop.**

First Name: Norma

Last Name: McDonald

Email Address: norma.mcdonald@ows.be

Affiliation:

Subject: Documentation missing

Comment:

There is no documentation containing information about the pathway,
making it impossible to comment or understand the CI number.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2019-02-11 05:31:47

No Duplicates.

There are no comments posted to Public Comments for LCFS pathway applications (tier2lcfspathways-ws) that were presented during the Workshop at this time.